REMARKS

This amendment is responsive to the Examiner's action mailed February 25, 2004. All rejections of the office action are respectfully traversed in view of this amendment. Accordingly, reconsideration is requested.

Clams 1-41 are pending.

Claims 1-41 stand rejected.

Claims 1, 14, 27, 29, 31 and 33 are independent.

Claims 1, 14, 27, 29, 31 and 33 are herein amended.

Claims 7, 8, 20 and 21 are herein cancelled.

The Office Action rejects claims 1-41 under 35 U.S.C. 103(a) based on Cohen, U.S. Publication No. 2002/0164000 in view of Saylor, U.S. Patent No. 6,501,832. Cohen '000 however, is inapplicable to the present claims because Cohen teaches a system for linking a user to voice pages, which can be telephone stations or world wide web (www) pages, in response to voice commands [0011]. The Cohen system provides a browser controller including a pointer to a start page [0025], and provides a static grammar for navigation and other functions, disclosed in Table I. Cohen, therefore, teaches a system for mapping a number of static user commands to dynamic browser based functions and operations [0039].

The present application, in contrast, is directed to a device which receives a request for information, accesses a tagged document, such as a script file, in response to the request, and generates a second set of output information suitable for audio output based on the request and the tagged document, as disclosed at page 15, lines 3-11 of the specification as filed and as generally recited in the Claims.

Therefore, Cohen '000 suggests a static mapping of voice commands to dynamic commands performed by a browser controller, the mapping based on a start page and performed in a control loop (paragraphs [0025],[0040], Table I). The present claims, in contrast, recite a tagged document, such as an XML

script, which provide application state information along with executable instructions (logic) for computing the second set of information output, as described at page 20, lines 9-23 of the specification as filed.

Accordingly, it is submitted that the present claims are distinguishable from Cohen '000 because Cohen does not teach or suggest, alone or in combination, any notion of accessing a tagged document as recited in the present claims 1, 14, 27, 29, 31 and 33.

Further, the examiner suggests that Saylor '832 teaches accessing a tagged document. Saylor, however, merely discusses replaying audio output from a Vpage entity. Nowhere in Saylor '832 is there a teaching disclosure or suggestion of executing a tagged document which provides application state information along with executable instructions for generating the second output set of information (output audio information) as defined in the present claims.

Accordingly, one of ordinary skill in the art would not look to Saylor '832 to modify Cohen '000 because Saylor discloses a Vcode system for providing access to voice content in Vcode/Vpage entries according to a Vcode or Vname (col. 13, lines 44-49). Such a Vcode system appears to index a text based string to a document (col. 13, lines 58-67), and does not suggest generating a second set of information based on the first set of information, as recited in the present claims.

Further, the present application teaches that the web navigation application generating the audio output selects the tagged document from among application defining documents 307 and filtering documents 302, as disclosed at page 27, lines 12-20. Such tagged documents are used to generate the audio information, specifically in that the application-defining document 307 is employed to access a filtering document 302, and the filtering document 302 is used to filter the retrieved web page 304a to provide generated content 306a or filtered web content 306b suitable for audio output.

No such tagged documents are shown or disclosed, alone or in combination, by Cohen '000 and/or Saylor '832. Further, the claimed retrieval of

the tagged documents involves accessing the document page 302 based on an identity of the request. The identity may be based on the identifier of the originator of the request, such as the user's phone number, and/or based on an identity of the destination of the request, such as the URL provided in the request or from another source, such as an LDAP resource, as disclosed at page 27, lines 21-25. Accordingly, claim 1 has been herein amended to recite <u>accessing the tagged document in response to receiving the first set of information by determining an identity of the request for the first set of information, and accessing the tagged document based on the identity of the request, wherein the identity of the request is based on at least one of an identifier for an originator of the request and an identifier for a destination of the request</u>, incorporating the subject matter of previous claims 7 and 8, now cancelled in view of this amendment, to further clarify and distinguish claim 1 over the prior art of record.

The Examiner suggests, at page 5 of the office action, that paragraphs [0030] and [0035] suggest the subject matter of former claims 7 and 8. Paragraph [0030], however, merely describes employing the browser controller 102 to call on a page which has been audio enabled and voice enabled. Therefore, paragraph [0030] merely suggests that the browser may apply the mapped dynamic command to either voice/audio enabled and non-voice-audio enabled pages. No computation or determination of an originator or destination is taught or disclosed suggested.

Similarly, paragraph [0035] is directed to employing the cited system to "access conventional telephony services." Accordingly, paragraph [0035] seems to disclose applying the mapped browser controller command to a web or telephony context. Again, no computation or determination of an originator or destination is taught or suggested as in the claimed invention.

Accordingly, as the disclosure in Cohen '000 provides no teaching or suggestion, alone or in combination, the claims limitation of <u>accessing the tagged document in response to receiving the first set of information by determining an identity of the request for the first set of information, and accessing the tagged</u>

<u>document based on the identity of the request, wherein the identity of the request</u> <u>is based on at least one of an identifier for an originator of the request and an</u> <u>identifier for a destination of the request</u>, as now recited in amended claim 1, it is respectfully submitted that claim 1 is now in condition for allowance.

Claim 14 has also been similarly amended with the subject matter of claims 20 and 21, and is therefore believed allowable. Further, the remaining independent claims 27, 29, 31 and 33 have been amended similarly as claim 1 for the reasons given above. As the remaining claims depend, either directly or indirectly, from claim 1, 14, 27, 29, 31 and 33, it is respectfully submitted that all claims 1-41 now in the case are in condition for allowance.

Applicant hereby petitions for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-0901.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 366-9600, in Westborough, Massachusetts.

Respectfully submitted,

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